

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

Michael G. Naessens,
Plaintiff(s),
v.
Bank of America, N.A.,
Defendant(s).

Case No. 2:25-cv-01079-RFB-NJK

Order

[Docket Nos. 62-65]

Pending before the Court are Plaintiff's motions to compel Defendant to amend its certificate of interested parties and for sanctions. Docket No. 62-65.¹ Defendant filed a response in opposition. Docket No. 71. Plaintiff filed a reply. Docket No. 73. The Court does not require a hearing. *See* Local Rule 79-1.

A party must file a certificate of interested parties to identify persons, associations, firms, partnerships, or corporations that have a "direct, pecuniary interest in the outcome of the case." Local Rule 7.1-1. A central function of this filing is to alert the assigned judges to potential recusal issues. *See id.*

The instant motion practice centers on Plaintiff's contention that Defendant should have identified Early Warning Services, LLC as an interested party in its certificate. *See, e.g.*, Docket No. 62 at 1. To the extent Plaintiff believes Early Warning Services, LLC is an interested party, then Plaintiff could identify it on his own certificate of interested parties. *See* Local Rule 7.1-1 (requiring certificates of interested parties to be filed by *pro se* plaintiffs). Indeed, Plaintiff appears to have now effectively done that. *See* Docket No. 19. Hence, it would appear the central function

¹ The Court liberally construes the filings of *pro se* litigants. *Erickson v. Pardus*, 551 U.S. 89, 94 (2007).

1 of these filings (alerting the judges to potential recusal issues) has been fulfilled.² Moreover, the
2 Court is not persuaded that sanctions should be imposed based on the circumstances.

3 Accordingly, Plaintiff's motions to compel and for sanctions are **DENIED**.³

4 IT IS SO ORDERED.

5 Dated: October 1, 2025

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Nancy J. Koppe
United States Magistrate Judge
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24 ² Plaintiff seems to misunderstand the function of certificates of interested parties. For
25 example, Plaintiff argues that his “ability to conduct discovery against a necessary party” has been
26 thwarted. Docket No. 62 at 2. The scope of relevance for discovery purposes is tied to the claims
and defenses in the case, *see* Fed. R. Civ. P. 26(b)(1), and Plaintiff does not explain why discovery
is impacted by the contents of a certificate of interested parties.

27 ³ The motion to compel seeks an order that Defendant file a corrected certificate of
28 interested parties. Docket No. 62 at 1. The reply brief seeks different relief. *See* Docket No. 73.
The Court declines to address requests for relief raised for the first time in reply. *Zamani v. Carnes*,
491 F.3d 990, 997 (9th Cir. 2007).